

RECEIVED

JAN 26 2011  
163

TONY R. MOORE, CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

THOMAS STEVEN SANDERS

\* CRIMINAL NO. 10-cr-00351  
\*  
\* 18 U.S.C. § 1201(a)(1)  
\* 18 U.S.C. § 924(c)(1)(A) & (j)(1)  
\*  
\* JUDGE DRELL  
\*  
\* MAGISTRATE JUDGE KIRK

**SUPERCEDING INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**  
18 U.S.C. § 1201(a)(1)

Between on or about September 5, 2010, and October 8, 2010, the exact dates being unknown to the Grand Jury, in the Western District of Louisiana, and elsewhere, the defendant, THOMAS STEVEN SANDERS, did unlawfully seize, confine, kidnap, abduct and carry away the victim, L.R., and did willfully transport the victim in interstate commerce from Arizona to Louisiana, and did hold her for reward or otherwise, resulting in her death, in violation of Title 18, United States Code, Section 1201(a)(1). [18 U.S.C. § 1201(a)(1)].

COUNT TWO  
18 U.S.C. § 924(c)(1)(A) & (j)(1)

Between on or about September 5, 2010, and October 8, 2010, the exact date being unknown to the Grand Jury, in the Western District of Louisiana, the defendant, THOMAS STEVEN SANDERS, did knowingly carry and use a firearm, to wit: a Norinco, model JW-15, .22 LR caliber rifle, and ammunition, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: kidnapping resulting in death, as alleged in Count One, and in doing so did murder and cause the death of L.R., through the use of a firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A) & (j)(1). [18 U.S.C. § 924(c)(1)(A) & (j)(1)].

NOTICE OF SPECIAL FINDINGS

**Statutory Aggravating Factors**

- a. The allegations of Counts One and Two of this Superseding Indictment are hereby realleged as if fully set forth and incorporated by reference.
- b. As to Counts One and Two of this Superseding Indictment:
  1. the defendant, THOMAS STEVEN SANDERS, was eighteen (18) years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a));
  2. the defendant, THOMAS STEVEN SANDERS, intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
  3. the defendant, THOMAS STEVEN SANDERS, intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code,


Section 3591(a)(2)(B));

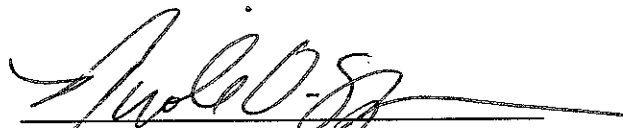
4. the defendant, THOMAS STEVEN SANDERS, intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
5. the defendant, THOMAS STEVEN SANDERS, intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
6. the death, or injury resulting in death, occurred during the commission or attempted commission of, or during the immediate flight from the commission of, an offense under 18 U.S.C. §1201 (kidnapping) (Title 18, United States Code, Section 3592(c)(1));
7. the defendant, THOMAS STEVEN SANDERS, committed the charged offenses after substantial planning and premeditation to cause the death of the victim (Title 18, United States Code, Section 3592(c)(9)); and,
8. the victim was particularly vulnerable due to her youth or infirmity (Title 18, United States Code, Section 3592(c)(11)).

All pursuant to Title 18, United States Code, Sections 3591 and 3592.

A TRUE BILL:

STEPHANIE A. FINLEY  
UNITED STATES ATTORNEY

By:   
William J. Flanagan (La. Bar No. 5603)  
Counsel to the United States Attorney

  
Nicole O. Snyder (Cal. Bar No. 250636)  
Assistant United States Attorney  
300 Fannin Street, Suite 3201  
Shreveport, Louisiana 71101-3068  
318-676-3600